

SIMPSON THACHER & BARTLETT LLP

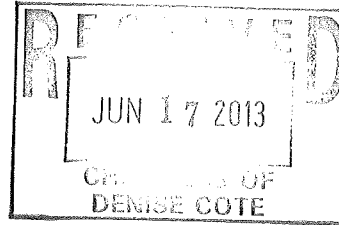
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**MEMO ENDORSED**



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BY EMAIL AND BY HAND

June 14, 2013

Re: *The Insurance Company of the State of Pennsylvania v.  
Argonaut Insurance Company (1:12-CV-06494)*

Honorable Denise L. Cote  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1610  
New York, New York 10007

Dear Judge Cote:

We are counsel to Plaintiff The Insurance Company of the State of Pennsylvania ("ICSOP") in the above-referenced action. Enclosed are unredacted courtesy copies of Plaintiff's Motion for Partial Summary Judgment, Defendant's Opposition to Plaintiff's Motion for Partial Summary Judgment, Plaintiff's Reply in Further Support of Plaintiff's Motion for Partial Summary Judgment, and all related papers.

Also enclosed on behalf of both parties are proposed reactions to Plaintiff's Opposition to Defendant's Motion for Partial Summary Judgment. The revisions conform to Your Honor's requests made during our telephone conference on May 30, 2013 to minimize the amount of material required to be filed under seal.

As with our earlier proposed redactions, information highlighted in yellow is information the parties seek to redact because it contains internal reserve information regarding the claims at issue, information highlighted in blue is information the parties seek to redact because it reflects privileged communications between ICSOP and its coverage counsel in the underlying California action, and information highlighted in orange is information the parties seek to redact because it reflects confidential settlement agreements with non-parties to this action. In accordance with Your Honor's Individual Practice Rule 4.A, we submit to the Court with the hard copy of this letter one full set of these documents in highlighted form and one partial, loose-leaf set of solely those pages from which the parties seek to redact material.

*As amended -  
Denise Cote  
June 18, 2013*

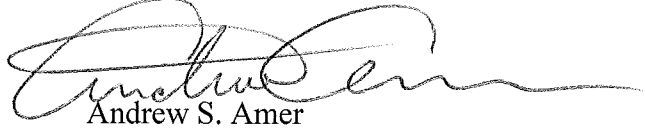
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June 14, 2013

We appreciate the Court's attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Andrew S. Amer", with a long horizontal flourish extending to the right.

Andrew S. Amer

Enclosures

cc: Sean Keely, Esq.